

**From:** [David Keen](#)  
**To:** [Gurinder Saini](#)  
**Cc:** [David Keen](#); [David Keen \(Business Fax\)](#)  
**Subject:** FW: Holnam - Title I Modification Interpretation  
**Date:** Thursday, July 03, 2008 15:05:25

---

FYI

-----Original Message-----

From: Miller.Scott@epamail.epa.gov [<mailto:Miller.Scott@epamail.epa.gov>]  
Sent: Wednesday, November 29, 2000 4:08 PM  
To: keen@rtpenv.com  
Subject: RE: Holnam

David,  
That's correct. "Title I modification" doesn't include construction or reconstruction for NSPS and NESHAPS.  
E. Scott Miller  
Environmental Engineer  
Operating Source Section  
APTMD  
U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303  
Phone (404) 562-9120  
Fax (404) 562-9095

keen@rtpenv.c  
om                      To:    Scott  
                         Miller/R4/USEPA/US@EPA  
11/29/00                cc:  
03:55 PM               Subject:    RE: Holnam  
Please  
respond to  
keen

Thanks Scott. This does help. Can I read this to mean that NSPS reconstructions and constructions are not covered (i.e., only NSPS modifications that increase emissions are Title I modifications)?  
111(a)(4)  
only addresses NSPS modifications.

Dave

-----Original Message-----

From: Miller.Scott@epamail.epa.gov [<mailto:Miller.Scott@epamail.epa.gov>]

Sent: Wednesday, November 29, 2000 3:25 PM  
To: keen@rtpenv.com  
Subject: Re: Holnam

David,

The definition of "title I modification" as taken from the proposed part 70 revisions dated August 31, 1995, is as follows:

"Title I modification or modification under any provision of title I of the Act means any modification under parts C and D of title I or sections 111(a)(4), 112(a)(5), or 112(g) of the Act; under regulations promulgated by EPA thereunder or in section 61.07 of part 61 this chapter; or under State regulations approved by EPA to meet such requirements."

Hopefully, this helps some. Admittedly, this is a little wordy but parts C and D are for major sources.

E. Scott Miller  
Environmental Engineer  
Operating Source Section  
APTMD  
U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303  
Phone (404) 562-9120  
Fax (404) 562-9095

keen@rtpenv.com  
To: Scott  
Miller/R4/USEPA/US@EPA  
11/29/00 cc: keen@rtpenv.com  
02:26 PM Subject: Holnam  
Please  
respond to  
keen

Scott,

Thanks for talking to me this morning. I found out that the permit for Holnam's Artesia site is not under public review yet. The agency and the site are trying to work out most of the details prior to submitting the permit for review.

As we discussed, if Holnam decides to proceed with the waste code issue (I found out after we spoke this morning that they may decide not to pursue it), I will likely develop a permit condition that we can use as a starting point.

The Subpart EEE language that I referred to can be found under the discussion of "comparable fuels exclusion" at FR 33783 (June 19, 1998). In reading it again, I am not sure how much it will help, but it has similar intent (i.e., allows for the burning of select materials as long as they meet general constituent and physical specifications).

Dave

-----  
David Keen  
RTP Environmental  
(919) 845-1422 x31  
(919) 845-1424 fax  
(919) 906-6016 mobile  
keen@rtpenv.com

No virus found in this incoming message.

Checked by AVG.

Version: 8.0.134 / Virus Database: 270.4.4/1532 - Release Date: 7/3/2008

8:32 AM